

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PARK AVENUE CONSULTING GROUP, INC.,

Plaintiff,

v.

NEWGOLD INC. AND FIRSTGOLD CORP.,

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

Civ. No. 08-CV-01850

Defendants.

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PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Peter H. Cooper, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

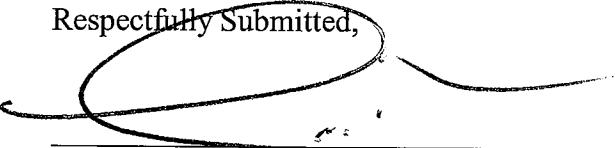
Applicants' Names:	John N. Blair J. Michael Lennon
Firm Name:	Blair & Roach LLP
Address:	2645 Sheridan Drive
City/State/Zip:	Tonawanda, New York 14150
Phone Number:	(716) 834-9181
Fax Number:	(716) 834-9197

John N. Blair is a member in good standing of the Bars of the State of New York and the State of Florida. J. Michael Lennon is a member in good standing of the Bar of the State of New York.

There are no pending disciplinary proceedings against John N. Blair or J. Michael Lennon in any State or Federal court.

Dated: New York, New York  
March 4, 2008

Respectfully Submitted,

  
Peter H. Cooper  
SDNY Bar #: PHC4714  
Biedermann, Reif, Hoenig & Ruff  
570 Lexington Avenue, 16th Floor  
New York, New York 10022  
Phone Number: (212) 697-6555  
Fax Number: (212) 986-3509

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PARK AVENUE CONSULTING GROUP, INC.,

Plaintiff,

v.

NEWGOLD INC. AND FIRSTGOLD CORP.,

Defendants.

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**AFFIDAVIT OF PETER H.  
COOPER IN SUPPORT  
OF MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

Civ. No. 08-CV-01850

STATE OF NEW YORK )  
                         ) SS.:  
COUNTY OF NEW YORK )

PETER H. COOPER, being duly sworn, hereby deposes and says as follows:

1. I am associated with Biedermann, Reif, Hoenig & Ruff, counsel for Defendants in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based upon my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit John N. Blair and J. Michael Lennon as counsel pro hac vice to represent Defendants in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1996. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with the Court.

3. I have known John N. Blair and J. Michael Lennon in the capacity of professional colleagues in the context of this matter.

4. Mr. Blair is the Managing Partner of Blair & Roach, LLP in Tonawanda, New York. He is a member in good standing of the Bars of the State of New York and the State of Florida. Certificates of good standing for Mr. Blair are attached as Exhibit A.

5. Mr. Lennon is an Associate Attorney at Blair & Roach, LLP. He is a member in good standing of the Bar of the State of New York. A certificate of good standing for Mr. Lennon is attached as **Exhibit B**.

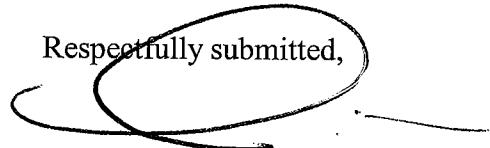
6. I have found Mr. Blair and Mr. Lennon to be skilled attorneys and persons of integrity. They are experienced in Federal practice and are familiar with the Federal Rules of Procedure.

7. Accordingly, I am pleased to move the admission of John N. Blair and J. Michael Lennon, pro hac vice. A proposed Order granting that admission is attached hereto as **Exhibit C**.

WHEREFORE, it is respectfully requested that the motion to admit John N. Blair and J. Michael Lennon, pro hac vice, to represent Defendants in the above-captioned matter, be granted.

Dated: New York, New York  
March 4, 2008

Respectfully submitted,

  
Peter H. Cooper  
SDNY Bar #: PHC4714

**Exhibit A**

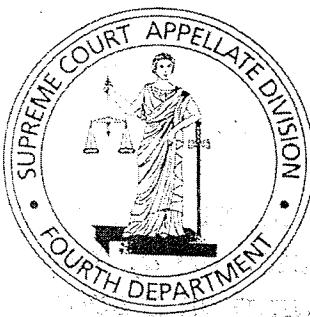
**SUPREME COURT OF  
THE STATE OF NEW YORK  
APPELLATE DIVISION, FOURTH DEPARTMENT  
ROCHESTER, NEW YORK**

*I, JOANN M. WAHL, Clerk of the Appellate Division of the Supreme Court in the Fourth Judicial Department, State of New York, do hereby certify that*

***JOHN NATHANIEL BLAIR***

*was duly admitted to practice as an attorney and counselor at law in all courts of this state by this Court on, **February 20, 1973**, and appears in good standing upon the roll of attorneys and counselors, and other records, in this office and has registered with the administrative office of the Courts as required by Judiciary Law §468-a.*

***IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of this Court, at the City of Rochester, February 22, 2008.***



*Joann M. Wahl*

*Clerk of the Court*



## The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
www.FLORIDABAR.ORG

State of Florida )

County of Leon )

In Re: 546267  
John N. Blair  
2645 Sheridan Dr  
Tonawanda, NY

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on April 18, 2002.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 22<sup>nd</sup> day of February, 2008.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/kf9:R10

Exhibit B

**SUPREME COURT OF  
THE STATE OF NEW YORK  
APPELLATE DIVISION, FOURTH DEPARTMENT  
ROCHESTER, NEW YORK**

*I, JOANN M. WAHL, Clerk of the Appellate Division of the Supreme Court in the Fourth Judicial Department, State of New York, do hereby certify that*

***JAMES MICHAEL LENNON***

*was duly admitted to practice as an attorney and counselor at law in all courts of this state by this Court on, **February 27, 2004**, and appears in good standing upon the roll of attorneys and counselors, and other records, in this office and has registered with the administrative office of the Courts as required by Judiciary Law §468-a.*

**IN WITNESS WHEREOF, I have**  
hereunto set my hand and affixed the  
seal of this Court, at the City of  
Rochester, February 22, 2008.



*Joann M. Wahl*

*Clerk of the Court*

**Exhibit C**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PARK AVENUE CONSULTING GROUP, INC.,

Plaintiff,

v.

NEWGOLD INC. AND FIRSTGOLD CORP.,

**ORDER FOR ADMISSION  
PRO HAC VICE**

Civ. No. 08-CV-01850

Defendants.

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Upon the motion of Peter H. Cooper, attorney for Defendants Newgold Inc. and FirstGold Corp., and said sponsors attorney's Affidavit in support;

**IT IS HEREBY ORDERED** that:

Applicants' Names: John N. Blair  
J. Michael Lennon  
Firm Name: Blair & Roach LLP  
Address: 2645 Sheridan Drive  
City/State/Zip: Tonawanda, New York 14150  
Phone Number: (716) 834-9181  
Fax Number: (716) 834-9197  
E-mail Address: [jnblair@blair-roach.com](mailto:jnblair@blair-roach.com)  
[jmlennon@blair-roach.com](mailto:jmlennon@blair-roach.com)

are admitted to practice pro hac vice as counsel for Defendants Newgold Inc. and FirstGold Corp. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: \_\_\_\_\_, 2008  
New York, New York

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United States District/Magistrate Judge

**AFFIDAVIT OF SERVICE BY REGULAR MAIL**

STATE OF NEW YORK )  
 )ss:  
COUNTY OF NEW YORK )

Secora M. Edey-Brathwaite, being duly sworn deposes and says that deponent is not a party to the action, is over 18 years of age and resides in Kings County.

On March 4, 2008 deponent served the within **Motion to Admit Counsel Pro Hac Vice**.

**Affidavit of Peter H. Cooper in Support of Motion upon:**

Levey, Filler, Rodriguez, Kelso & DeBianchi, LLP  
41-26 27<sup>th</sup> Street, Suite 3D  
Long Island City, New York 11101-3825

at the address designated by said attorneys for this purpose by depositing same enclosed in a post-paid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Post Office within the State of New York.

Secora M. Edey-Brathwaite

Subscribed and sworn to before me this  
4th day of March, 2008

~~PETER H. COOPER~~  
Notary Public State of New York  
No. 02CO5059941  
Qualified in NEW YORK County  
Commission Expires MAY 6, 2010